EXHIBIT 70

SECOND MAO DECLARATION

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

PUBLIC REDACTED VERSION

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 1              UNITED STATES DISTRICT COURT

 2            NORTHERN DISTRICT OF CALIFORNIA

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 4    ANIBAL RODRIGUEZ, JULIEANNA        )

 5    MUNIZ, ELIZA CAMBAY, SAL           ) Case No.:

      CATALDO, EMIR GOENAGA, JULIAN      ) 3:20-cv-04688

 6    SANTIAGO, HAROLD NYANJOM, KELLIE   )

 7    NYANJOM, and SUSAN LYNN HARVEY,    )

 8    individually and on behalf of all  )

 9    others similarly situated,         )

10                    Plaintiffs,        )

             vs.                         )

11    GOOGLE LLC,                        )

12                    Defendant.         )

      ------------------------------------)

13       ***HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY***

14

15                 REMOTE PROCEEDINGS OF THE

16            VIDEOTAPED DEPOSITION OF STEVE GANEM

17                 FRIDAY, OCTOBER 28, 2022

18

19

20    REPORTED BY NANCY J. MARTIN

21    CSR. NO. 9504, RMR, RPR

22    CLAUDIA R. GARCIA, CSR. 12812

23    JOB No. 5554575

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25    PAGES 1-325

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1   BY MR. MAO:

2   Q   Are those proto buffers, by the way, or are

3   those protocols, or is that like somehow different than

4   proto buffers?

5   A   They are related. But I'm not sure if they   06:34:42

6   are the same.

7   Q   Okay. I presume that you can't enumerate the

8   ███████ off the top of your head; right?

9   A   I can't. Though I think earlier we

10   identified, I believe, ███ for apps. And we hadn't   06:35:02

11   discussed Google Analytics for the web, which I believe

12   has other logs.

13   Q   Sorry. Which document did we identify ███?

14   A   You may recall that earlier, when we went back

15   on the record, we came back to you with more details   06:35:26

16   regarding the logs after speaking to engineers.

17   Q   I oh, see. That's what you're referring to.

18   Sorry. I was confused. I thought maybe we were

19   referring to a document that we had just looked at.

20   So can you confirm what those ███ are in terms   06:35:42

21   of the ones that are for -- the ones that are listed

22   there? And I appreciate you telling me which three

23   protocols you're talking about, though.

24   MR. SANTACANA: So it sounds like outside

25   scope as to the other ███, is what he's saying.   06:35:59

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1   MR. MAO: Well, he said he thinks. So I want

2   to make sure.

3   BY MR. MAO:

4   Q   I mean, you have a very easy way to verify

5   that. It looks to me like the log sources, the   06:36:15

6   details are there under ███████████████████?

7   MR. SANTACANA: Where? Oh, log, sources,

8   details -- okay. We can try.

9   MR. MAO: I appreciate that.

10   MR. SANTACANA: Thanks for pointing that out. 06:36:32

11   MR. MAO: Yeah. I kind of make life easier

12   for everyone.

13   BY MR. MAO:

14   Q   Um, if you don't mind going -- turning back a

15   little bit with me to 440, and you're going to have to   06:36:43

16   really expand this here. That will be page 8 of the

17   PDF. I have to magnify that a little bit.

18   My first question actually is, what are

19   bundles, the bundles referred there? I guess, like,

20   I'm trying to understand, are they more like -- like   06:37:14

21   event rows, or is it more than that?

22   A   Earlier when describing the data flow from a

23   user interaction to the registering of an event to the

24   later transmission of an event, all done in a way that

25   tries to minimize the use of the end user's device   06:37:47

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1   resources and bandwidth.

2   Part of what we do to reduce that usage of

3   bandwidth and battery is to bundle together events

4   which occurred within a short time span of each other

5   into a single file that is transmitted to Google.   06:38:07

6   Bundle here refers to that grouping together of events

7   which were registered within a certain time span.

8   Q   And those -- those bundles there appear to me

9   to -- all three bundles, if you look at the last row,

10   all seem to include ████████████ as in those   06:38:35

11   could actually be -- end up in the same bundle

12   together; is that correct?

13   A   ██████████ would never be in the same

14   bundle as each other.

15   Q   Could either -- or sorry.   06:38:58

16   Can they though however be in the same bundle

17   as the ████?

18   A   ██████████ would never be in the same

19   bundle as each other. It's possible that ██████████

20   could be in the same bundle together.   06:39:21

21   Q   Got it. And that's because on iOS, there is

22   no DSID?

23   A   That's correct.

24   Q   Are any of these ████████████████ ever

25   present in Google Takeout data?   06:39:41

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